

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbkllp.com)
Jane Kim (#298192)
(jkim@kbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON REORGANIZED
DEBTORS' SIXTY-FIRST OMNIBUS
OBJECTION TO CLAIMS (UNTIMELY NO
LIABILITY / PASSTHROUGH CLAIMS)**

**Response Deadline:
March 24, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: April 7, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **April 7, 2021, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable Dennis
Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Fifth Amended General
Order No. 38 In re: Coronavirus Disease Public Health Emergency*, effective March 1, 2021 and until
otherwise ordered, **all hearings shall be conducted by video or teleconference. The Courtroom
will be closed.** All interested parties should consult the Bankruptcy Court’s website at
www.canb.uscourts.gov for information about court operations during the COVID-19 pandemic. The
Bankruptcy Court’s website provides information regarding how to arrange a telephonic or video
appearance. If you have any questions regarding how to appear at a court hearing, you may contact the
Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy
Court’s website.

11 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the
12 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Sixty-First
Omnibus Objection to Claims (Untimely No Liability / Passthrough Claims)*, filed on February 25,
13 2021 [Dkt. No. 10284] (the “**Omnibus Objection**”).

14 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus
Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the
15 Reorganized Debtors at the above-referenced address or by email at PGEclaims@kbkllp.com so as to
be received by no later than **4:00 p.m. (Pacific Time) on March 24, 2021**. Any oppositions or
16 responses must be filed and served as described in the *Order Approving (A) Procedures for Filing
Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*,
17 entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief
requested in the Omnibus Objection may be granted without a hearing if no opposition is timely
filed and served in accordance with the Omnibus Objections Procedures Order.** In deciding the
18 Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and
related Adversary Proceedings.

20 **PLEASE TAKE FURTHER NOTICE** that a customized Sixty-First Omnibus Claim
21 Objection Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of the
parties to whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

23 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its
supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at
24 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims
25 agent, Prime Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll
free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
26 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

1 Dated: February 25, 2021

2 **KELLER BENVENUTTI KIM LLP**

3 /s/ Dara L. Silveira
4 Dara L. Silveira

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Attorneys for Debtors and Reorganized Debtors

1 **Exhibit A**

2 **Sixty-First Omnibus Claim Objection Notice**

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THE OBJECTION DESCRIBED IN
THIS NOTICE ASKS THE COURT TO
DISALLOW AND/OR EXPUNGE
YOUR CLAIM(S) IDENTIFIED AS
“OBJECTED-TO” ON THE
FOLLOWING PAGE OF THIS
NOTICE.

CLAIMANTS RECEIVING THIS
NOTICE SHOULD READ THIS
NOTICE CAREFULLY BECAUSE THE
OBJECTION MAY AFFECT YOUR
RIGHT TO RECEIVE A
DISTRIBUTION ON YOUR CLAIM IN
THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE
CONTACT PRIME CLERK, LLC, AT
(844) 339-4217

THE LAST PARAGRAPH OF THIS
NOTICE EXPLAINS HOW YOU CAN
OBTAIN A COMPLETE COPY OF THE
OBJECTION, AT NO COST TO YOU.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
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* All papers shall be filed in the Lead Case, No.
19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE REORGANIZED
DEBTORS’ SIXTY-FIRST OMNIBUS
OBJECTION TO CLAIMS (UNTIMELY NO
LIABILITY / PASSTHROUGH CLAIMS)**

Response Deadline:
March 24, 2021, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: April 7, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 [Claimant Name]

2

Objected-To Claim(s)					Basis for Objection
Date	Claim #	Debtor	Classification	Amount	

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6 On February 25, 2021, PG&E Corporation and Pacific Gas and Electric Company, as debtors
7 and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the
8 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed
9 their *Sixty-First Omnibus Objection to Claims (Untimely No Liability / Passthrough Claims)* (the
“**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of
California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus
Objection may be obtained at no cost, as provided below.

10 **Any Response (as defined below) to the Omnibus Objection must be filed and**
11 **served upon the Reorganized Debtors’ Counsel by March 24, 2021 (the “Response**
12 **Deadline”);**

13 **Any Response must be accompanied by any declarations or memoranda of law any**
14 **responding party wishes to present in support of its position;**

15 **If there is no timely Response, the Bankruptcy Court may enter an order granting**
16 **the Omnibus Objection to your Proof(s) of Claim by default.**

17 **If you file a timely Response, the Hearing will be held at the date and time shown**
18 **below. If factual disputes are presented by the Objection and the Response, the**
19 **Hearing will proceed as a status conference; factual disputes will not be decided at**
20 **the Hearing, but at a future evidentiary hearing that may be set at the Hearing.**
21 **Issues of a purely legal nature, where facts are not in dispute, may be decided at**
22 **the Hearing. See Bankruptcy Local Rule 3007-1.**

23 **If you file and serve a timely Response, the date, location and time of the Hearing**
24 **are:**

25 **April 7, 2021 at 10:00 a.m. (Pacific Time)**

26 **Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA**

27 The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy
28 Judge. Pursuant to the Bankruptcy Court’s *Fifth Amended General Order No. 38 In re: Coronavirus*
Disease Public Health Emergency, effective March 1, 2021 and until otherwise ordered, **all hearings**
shall be conducted by video or teleconference. The Courtroom will be closed. All interested
parties should consult the Bankruptcy Court’s website at www.canb.uscourts.gov for information about
court operations during the COVID-19 pandemic. The Bankruptcy Court’s website provides
information regarding how to arrange a telephonic or video appearance. If you have any questions
regarding how to appear at a court hearing, you may contact the Bankruptcy Court by calling 888-821-
7606 or by using the Live Chat feature on the Bankruptcy Court’s website.

1 **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim
with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

2 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
3 Objection, the Reorganized Debtors seek to disallow and/or expunge one or more of your Proof(s) of
4 Claim (as defined therein) listed above as “Objected-To Claim(s)” on the grounds that the designated
5 Proof(s) of Claim seek recovery of amounts for which the Debtors are not liable and that the Proof(s)
6 of Claim are untimely .

7 If you do **NOT** oppose the disallowance and/or expungement of your Objected-To Proof(s) of
8 Claim listed above, then you do **NOT** need to file a written Response to this Omnibus Objection and
9 you do **NOT** need to appear at the Hearing. If you do nothing, the Objected-To Claim(s) will be
10 disallowed and/or expunged.

11 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance and/or
12 expungement of your Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a
13 “**Response**”), in writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized
14 Debtors at PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on
15 March 24, 2021 (the “Response Deadline”)**: You must file the Response through the Court’s
16 electronic case filing (“ECF”) system if you have access to the ECF system; service on the
17 Reorganized Debtors’ Counsel will occur automatically upon ECF filing; and no separate service of
18 your Response is required. If you do **NOT** have access to the ECF system, service must be made by
19 electronic mail to the Reorganized Debtors’ counsel at PGEclaims@kbkllp.com, and you must arrange
20 for the Response to be filed with the Court within two business days thereafter. If you do not have the
21 ability to serve a Response electronically, the Response must be served by mail, express or some other
22 means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the Response
23 Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or commercial
24 express service that will make actual delivery not more than two business days after the Response
25 Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by email,
26 telephone or facsimile before the Response Deadline of the Claimant’s name and phone number, the
27 number of the Omnibus Objection, and the fact that a paper Response is being delivered by express.

28 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
1 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
2 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
3 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
4 Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
5 the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
6 knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,
7 and/or the name, address, and telephone number of your attorney and/or designated representative to
8 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the
9 name, address, telephone number, and email address of the party with authority to reconcile, settle, or
10 otherwise resolve the Omnibus Objection on your behalf, if any.

11 If the Bankruptcy Court does not disallow and/or expunge your Objected-To Proof(s) of Claim
12 listed above, then the Reorganized Debtors have the right to object on other grounds to your Proof(s)
13 of Claim at a later date. You will receive a separate notice of any such objection.

14 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus
15 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
16 (i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account
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1 required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim
2 agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,
3 by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
4 request a complete copy of the Omnibus Objection, including all Exhibits.

5 Dated: February 25, 2021

KELLER BENVENUTTI KIM LLP

6 /s/ Dara L. Silveira
7 Dara L. Silveira

8 *Attorneys for Debtors and Reorganized Debtors*

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